

M/047/064



State of Utah

Department of Natural Resources

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January 13, 2006

Mr. James Kohler
Bureau of Land Management
440 West 200 South, Suite 500
P. O. Box 45155
Salt Lake City, Utah 84145-0155

Subject: Second Review, Lexco, Cottonwood Mine, M/047/064, Uintah County, Utah

Dear Mr. Kohler:

The Division of Oil, Gas and Mining has reviewed the referenced mine plan and has the following comments. As before, the Division would like to coordinate its review with the BLM.

1. Under Section 10—Abandonment—the second sentence is not complete. There is no continuity between the partial sentence on page 10 and the partial sentence on the top of page 11.
2. The plan describes a 12-inch concrete seal that will be placed over the shafts during closure. For reclamation surety calculation purposes, please include engineering details for this concrete seal.
3. Figure 3 shows the location of the escapeways located at the site. Please describe how these areas will be accessed during final closure to close these openings.
4. A water discharge point is noted at the Shaft #1 site. Will there be any additional water discharges from the other shafts?
5. The plan identifies only 0.9 acres of new road construction that includes 800' of new construction and 3500' of road widening. The maps indicate that there is approximately 7500' of road at the site, about 1400' of which is noted as new haulage road. Because the only purpose of these roads is to access the shafts at the site, all of the mine access roads should be reclaimed during final closure.
6. The plan says soil removal will be limited to that necessary for vegetation removal. The operator should commit to salvage available "topsoil." Topsoil is unlikely to have anything that would be detrimental to vegetation establishment, and in this area it is probably not be very deep.

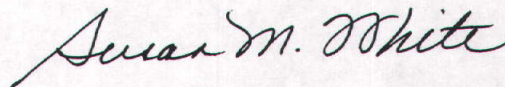
The EA indicates 35 percent of the soils in the area are shallow, 50 percent are deep or moderately deep, and 15 percent are badlands or rock outcrop. While this does not

give precise depths of salvageable soil, the Division **assumes** the soils would be between three and six inches deep.

7. The plan says all seed used to stabilize stockpiles and conduct final reclamation will consist of weed free pure live seed. This commitment is impractical because "pure live seed" has 100 percent germination and 100 percent purity. Instead, the operator should commit to plant the stated quantities of pure live seed. The seed should include no restricted or prohibited weeds and should be tested and labeled in compliance with the Utah Seed Act.
8. The EA says vegetation in the area includes western wheatgrass, galleta, bottlebrush squirreltail, and sand dropseed. Western wheatgrass and bottlebrush squirreltail are both excellent reclamation species and would probably provide good vegetation cover. They should be included in the seed mix at the rates of one and two pounds per acre of pure live seed for bottlebrush squirreltail and western wheatgrass, respectively.
9. The Division recommends the surface preparation and seeding methods section include the following commitments:
 - a. The surface should be left very rough. This is best done by ripping or by pocking the site with a trackhoe.
 - b. If seed is broadcast, this should be done as soon after surface preparation as possible.
 - c. Sagebrush seed should not be drilled but should be hand broadcast into loose soil or over snow.

If you or your staff would like to meet and discuss these comments and others you may have, please contact me at 801-538-5258. Thank you for your cooperation in reviewing this plan.

Sincerely,



Susan M. White
Mining Program Coordinator
Minerals Regulatory Program